

**EXHIBIT A**

**Proposed Order**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' FORTY-SEVENTH (NON-SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN NO LIABILITY  
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the forty-seventh omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.



accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each No Liability Claim set forth in Schedule 1 and Schedule 2 attached hereto is disallowed and expunged in its entirety.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.
5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order



will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.



9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

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The Honorable John T. Dorsey  
United States Bankruptcy Judge



**SCHEDULE 1**

**No Liability Portal Claims**



**FTX Trading Ltd. 22-11068 (JTD)**  
**Forty-Seventh Omnibus Claims Objection**  
**Schedule 1 - No Liability Claims**

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
89688	Name on file	West Realm Shires Services Inc.	USD	197,550.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. The claimant asserts post-petition deposits dated November 14, 2022, which were not part of the claimant's petition date customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any pre-petition liability owing to, or customer entitlement of, the claimant.				
90675	Name on file	West Realm Shires Services Inc.	ETH	1,267.5400000000000000
			FTT	0.2300000000000000
			MOB	185,927.8500000000000000
			USD	64.2700000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
43153	Name on file	FTX Trading Ltd.	USD	102,962.5700000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
84134	Name on file	FTX Trading Ltd.	USD	170,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94058	Name on file	FTX Trading Ltd.	BTC	3,500.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
83666	Name on file	FTX Trading Ltd.	BCH	16.0000000000000000
			BNB	215.4100000000000000
			BTC	2.2640000000000000
			CRO	121,950.0000000000000000
			DOT	720.0000000000000000
			ETC	514.8400000000000000
			ETH	58.5400000000000000
			FTT	241.0000000000000000
			LTC	86.6000000000000000
			SAND	6,172.0000000000000000
			SHIB	1,000,000,000.0000000000000000
			SOL	5,000.0000000000000000
			TRX	200,000.0000000000000000
			XRP	21,839.3000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.



Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
93839	Name on file	FTX Trading Ltd.	BCH	35,000.0000000000000000
			BTC	100.0000000000000000
			DOGE	280.0000000000000000
			USDC	28.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
91706	Name on file	FTX Trading Ltd.	USD	Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
48417	Name on file	FTX Trading Ltd.	USD	103,315.1900000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
51095	Name on file	FTX Trading Ltd.	USD	364,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
48745	Name on file	FTX Trading Ltd.	SOL	1,758.6500000000000000
			STG	1,670.0000000000000000
			USD	453,890.5400000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
1942	Name on file	FTX Trading Ltd.	USD	599,808.9900000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
33722	Name on file	FTX Trading Ltd.	BULL	0.0138169200000000
			SOL	3.9109810600000000
			SRM	9.9244988700000000
			USD	120,850.8900000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
87730	Name on file	FTX Trading Ltd.	USDT	226,120.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
39834	Name on file	FTX Trading Ltd.	ALGO	2,291,195.0000000000000000
			BTC	0.0505985000000000
			ETH	3.8449769500000000
			ETHW	3.8449769500000000
			RSR	35,946.2192600000000000

Undetermined\*: Indicates claim contains unliquidated and/or undetermined amounts



Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
			VET VECHAIN	22,967.4819000000000000
			XLM	22,981.1852275000000000
			XRP	10,061.1807060000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
51121	Name on file	FTX Trading Ltd.	BCH	10,000.0000000000000000
			BTC	10,000.0000000000000000
			FTT	10,000.0000000000000000
			USD	10,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
86947	Name on file	FTX Trading Ltd.	BTC	3.7000000000000000
			DOGE	45,000,000.0000000000000000
			ETH	250.0000000000000000
			SHIB	450,000,000.0000000000000000
			USD	16,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
58034	Name on file	West Realm Shires Services Inc.	USD	150,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
49572	Name on file	FTX Trading Ltd.	ETH	150.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
77135	Name on file	FTX Trading Ltd.	FTT	16.0000000000000000
			USD	400,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
48049	Name on file	FTX Trading Ltd.	XRP	490,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94254	Name on file	FTX Trading Ltd.	AAVE	160.0000000000000000
			APE	26,000.0000000000000000
			ATLAS	32,900.0000000000000000
			ATOM	2,299.0000000000000000
			AVAX	2,870.0000000000000000
			BULL	10.0000000000000000
			ETH	65,890.0000000000000000



Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
89138	Name on file	West Realm Shires Services Inc.	BTC	7,351.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
49574	Name on file	FTX Trading Ltd.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
49579	Name on file	FTX Trading Ltd.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
71795	Name on file	FTX Trading Ltd.	1INCH	1.029506177576000
			AXS	6.190514452833973
			BTC	0.000000013048600
			DOGE	7.000000000000000
			ETH	7.506700030570240
			ETHW	0.015741333918640
			LUNA2	0.000000019502299
			MATIC	9.989982006892348
			SAND	37,742.1587400000000000
			SGD	0.000000012249269
			SOL	3.022112972405158
			TRX	200.9972000000000000
			USD	10.306173649272977
			USDC	136,547.720956240000000
			USDT	0.000000017429700
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94005	Name on file	West Realm Shires Services Inc.	MXN	
			SOL	300.0000000000000000
			USD	1,891,819.0000000000000000
			USDT	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
54969	Name on file	FTX Trading Ltd.	BTC	10,000.0000000000000000
			BULL	20,000.0000000000000000
			DOGE	5,000.0000000000000000
			DOGEBULL	2,000.0000000000000000
			ETH	2,000.0000000000000000



Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
			SHIB	5,000.0000000000000000
			SOL	200.0000000000000000
			USD	20,000.0000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

93951	Name on file	FTX Trading Ltd.	ETH	1,857.0000000000000000
			EUR	605.0000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.



**SCHEDULE 2**

**No Liability Non-Portal Claims**



**FTX Trading Ltd. 22-11068 (JTD)**  
**Forty-Seventh Omnibus Claims Objection**  
**Schedule 2 - No Liability Claims**

<u>Asserted Claims</u>				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
93705	Name on file	FTX Trading Ltd.	BTC	10.0000000000000000
			DOGE	97.0000000000000000
			SHIB	1,600,000.0000000000000000
			Other Activity Asserted: 101628.00 - An offer for my coins	

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

91333	Name on file	FTX Trading Ltd.	BTC	10.0400000000000000
			FB	7.7000000000000000
			SRM_LOCKED	300.4800000000000000
			USD	771,858.9000000000000000
			Other Activity Asserted: \$942,204.95 - \$942,204.95	

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.